

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK ALLEN BUSSE,

Defendant.

INDICTMENT

(18 U.S.C. § 2251 (a))

(18 U.S.C. § 2251(e))

(18 U.S.C. § 2253 (a))

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

On or about July 24, 2006, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

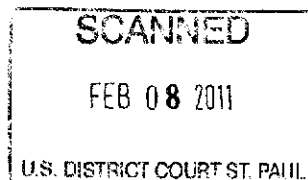
did employ, use, persuade, induce, entice, and coerce A.M.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file DSC00008[40808].JPG, which visual depiction was produced using materials, including a Sony DSC-V3 camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Production of Child Pornography)

On or about July 24, 2006, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,



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did employ, use, persuade, induce, entice, and coerce A.M.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file DSC00010[40816].JPG, which visual depiction was produced using materials, including a Sony DSC-V3 camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3

(Production of Child Pornography)

On or about April 5, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce T.T.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 39713.JPG, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

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COUNT 4

(Production of Child Pornography)

On or about February 9, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce T.T.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 38531.avi, which visual depiction was produced using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 5

(Production of Child Pornography)

On or about March 7, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce T.T.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 39445.avi, which visual depiction was produced using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

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COUNT 6

(Production of Child Pornography)

On or about March 7, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce R.C.W., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 39445.avi, which visual depiction was produced using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 7

(Production of Child Pornography)

On or about March 2, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce R.C.W., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 38502.jpg, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in

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violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 8

(Production of Child Pornography)

On or about March 2, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce R.C.W., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 38506.jpg, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 9

(Production of Child Pornography)

On or about March 8, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce R.C.W., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file MVI_3480[39932].AVI, which visual depiction was produced

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using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 10

(Production of Child Pornography)

On or about April 20, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce Z.J.L., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 42782.jpg, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 11

(Production of Child Pornography)

On or about April 20, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce Z.J.L., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer

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image file 42792.jpg, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 12

(Production of Child Pornography)

On or about April 20, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce Z.J.L., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 42794.jpg, which visual depiction was produced using materials, including a Canon PowerShot camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 13

(Production of Child Pornography)

On or about April 20, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

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did employ, use, persuade, induce, entice, and coerce Z.J.L., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 42820.avi, which visual depiction was produced using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 14

(Production of Child Pornography)

On or about April 20, 2008, in the State and District of Minnesota, the defendant,

MARK ALLEN BUSSE,

did employ, use, persuade, induce, entice, and coerce Z.J.L., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is computer image file 42852.avi, which visual depiction was produced using materials, including a Canon camera, that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Counts 1 through 14 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

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As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2251(a) and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON